

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION**

**GLENN PAGE, INDIVIDUALLY  
AND D/B/A GLENN PAGE  
CONSULTING,**

**Plaintiff,**

**V.**

**JIMMY CLEVELAND,  
INDIVIDUALLY AND D/B/A  
CLEVECO CONSULTING,**

**Defendant.**

[illegible]

**Civil Action No. 7:13-cv-00043-O**

# ATTORNEY KATHLEEN BROWN'S MOTION TO WITHDRAW AS ATTORNEY IN CHARGE

1. Kathleen Brown moves for an Order to Withdraw as Attorney in Charge.
2. The grounds for this motion are:
  - a. Defendant insists upon pursuing an objective that Kathleen Brown considers imprudent.
  - b. Defendant has failed, repeatedly, to substantially fulfill obligations to Kathleen Brown regarding her services to him, including failing to communicate with Kathleen Brown, communicating in a manner that has caused substantial deterioration in the attorney-client relationship, and failing to pay the lawyer's fee as agreed.

- c. Defendant has been provided ample warning of the need to pay attorney's fees in order to avoid withdrawal, but Defendant has failed to pay the fees as agreed.
- d. Defendant's actions have rendered representation unreasonably difficult, and further representation by Kathleen Brown will result in unreasonable financial hardship on her.

Respectfully submitted,  
By:           /s/ Kathleen Brown            
Kathleen Brown  
TBN 24036275  
Attorney at Law  
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Attorney for Defendant  
Cleveco Consulting L.L.C.

**CERTIFICATE OF CONFERENCE**

I certify that on July 8, 2014, I conferred with Brett L. Myers, and he does not oppose my Motion to Withdraw as Attorney in Charge.

          s/ Kathleen Brown            
Kathleen Brown

**CERTIFICATE OF SERVICE**

I, Kathleen Brown, hereby certify that on the 9<sup>th</sup> day of July, 2014, that a true, correct and unaltered copy of the foregoing document together with any and all attachments and/or exhibits referenced therein were served, via ECF

Brett L. Myers  
Attorney at Law  
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Dallas, TX 75240  
/s/ Kathleen Brown  
Kathleen Brown